

IN THE UNITED STATES BANKRUPTCY COURT
District of Puerto Rico

In the Matter of:

CARMEN DELIA CENTENO CORDERO

Debtor(s)

Case No. **08-000151 BKT**

Chapter 13

**MOTION TO RECONSIDER DISMISSAL
AND VACATE ORDER OF DISMISSAL**

TO THE HONORABLE COURT:

The undersigned, attorney for the above-named debtor, notifies the Court as follows,

1. An order dismissing case was entered in response to an unopposed motion filed attorney Vivian Ortiz Ponce on behalf of Banco Popular/Oriental Bank.
2. The trustee's motion was grounded on debtor's failure to make three post-petition payments that added up to \$1,809.01.
3. This case was filed on 1/15/2008 and should have terminated on 1/14/2012 with a plan of \$200.00 x 48 months.
4. Debtor became ill during several periods of the case and lately was on sick leave for over 6 months, reason why their sons took control of their obligations with her bankruptcy case to continue making the payments for her. In spite of their efforts the plan accumulated arrears and also the mortgage could not be paid during three months as the motion for dismissal explains.
5. Debtor did not communicate with the undersigned when they received notice of the motion to dismiss because of her emotional condition and she misplaced the notice. We were able to contact her only after the order of dismissal was entered and we learned of her by means of another client of the undersigned. As soon her sons became aware of the situation they entered into conversation with the bank and pay the amount of \$2,258.93 (as is evidence in the attached page to this motion). They are will be able to pay the outstanding balance in the plan not later than August 30.
6. Debtor needs to complete her case to find a solution with respect to other numerous creditors in the Master Address List and requests to the court an opportunity to terminate her case by entering an order setting aside the order of dismissal and another order discharging her of her obligations as it was intended all along, but was not possible by debtor's difficult health

situation. If the remedy is not provided, debtor will face again an extremely heavy burden with her unpaid debts and any other alternative will be an extreme hardship for her.

NOTICE

TAKE NOTICE that **within fourteen (14) days** after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted or decided without actual hearing unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

WHEREFORE, we respectfully request from this Honorable Court to take notice of the informed above, reconsider and vacate order dismissing case.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this same date a true and exact copy of the foregoing has been filed with the Clerk of the Court that will be notified to the Chapter 13 Trustee Alejandro Oliveras Rivera, attorney Vivian Ortiz Ponce, Esq., and all other appearing parties using the Court's CM/ECF system. Non appearing parties will be notified using the U. S. regular Postal Service as per Master Address List attached.

In Vega Baja, Puerto Rico, on this August 8, 2013

s/ Juan O. Calderon Lithgow
JUAN O. CALDERON LITHGOW
ATTORNEY FOR DEBTOR, 205607
APARTADO 1710
VEGA BAJA, PR 00694-1710
TEL.: 787-858-5476
Email: caldlithlaw@gmail.com

CARMEN DELIA CENTENO-CORDERO
PO BOX 1603
BARCELONETA, PR 00617

COOPACA
PO BOX 1056
ARECIBO, PR 00613-1056

PREPA (AEE)
PO BOX 363508
SAN JUAN, PR 00936-3508

JUAN O. CALDERON-LITHGOW
JUAN O. CALDERON-LITHGOW
P.O. BOX 1710
VEGA BAJA, P. 00694-1710

FEMA
MT. WEATHER
P.O. BOX 800 (AR)
BERRYVILLE, VA 22611-0800

SANTANDER
PO BOX 362589
SAN JUAN, PR 00936-2589

ARROW FINANCIAL SERVICE
PO BOX 21031
CHICAGO, IL 60678-1031

FEMA
PO BOX 10055
HYATTSVILLE, MD 20782-7055

US DEPARTMENT EDUC
PO BOX 4169
GREENVILLE, TX 75403-4169

BANCO DE LA VIVIENDA
PO BOX 71361
SAN JUAN, PR 00936-8461

FIRST PREMIER BANK
PO BOX 5519
SIOUX FALLS, SD 57117-5519

WALMART
PO BOX 530927
ATLANTA, GA 30353-0927

C.R.I.M.
P.O. BOX 195387
SAN JUAN, PR 00919-5387

ISLAND CASH
PO BOX 931
MANATI, PR 00674-0931

CINGULAR WIRELESS
PO BOX 15067
SAN JUAN, PR 00902-8567

ISLAND FINANCE
PO BOX 931
MANATI, PR 00674

CITIFINANCIAL
PO BOX 370
BARCELONETA, PR 00617

MACYS DEPT STORE
PO BOX 183083
COLUMBUS, OH 43218-3083

CONNECTICUT ASSISTANCE
PO BOX 689
ROCKY HILL, CT 06067-3627

ORIENTAL GROUP
PO BOX 71578
SAN JUAN, PR 00936-8678

COOP A/C MANATI
PO BOX 30562
MANATI, PR 00674

PRASA (AAA)
PO BOX 14580
SAN JUAN, PR 00916-4580

